

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MINNESOTA MINING AND
MANUFACTURING COMPANY, et al.

Plaintiffs,

v.

ACCO BRANDS, INC., and AMERICAN
COVERS, INC.

Defendants.

Civil Action No. 01-607 JRT/AJB

Judge John R. Tunheim
Magistrate Judge Arthur J. Boylan

MINNESOTA MINING AND
MANUFACTURING COMPANY, et al.

Plaintiffs,

v.

VELO ENTERPRISE CO., LTD

Defendant.

Civil Action No. 02-4891 JRT/AJB

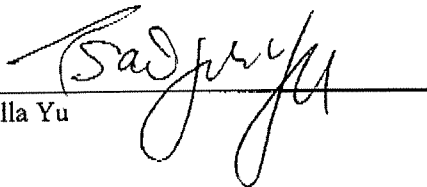
Judge John R. Tunheim
Magistrate Judge Arthur J. Boylan

DECLARATION OF STELLA YU

1. I am the president and general manager of Velo Enterprises Company Limited (“Velo Enterprises”). Velo Enterprises is a defendant in the captioned case. It has its headquarters and principal place of business in Taichung, Taiwan. Velo Enterprises has no offices in the United States.
2. Velo Enterprises received 3M’s Amended Notice of Deposition of Velo Enterprises Company Limited in this action. Velo Enterprises designated Mr. Wu, Kuang-hui (“Mr. Wu”) and me to be deposed on its behalf.
3. Mr. Wu is the assistant general manager of Velo Enterprises. He is a key officer of the company, and is responsible for managing Velo Enterprises in my absence.

4. Mr. Wu and I both live in Taichung, Taiwan.
5. Taichung is approximately a three and a half hour drive from Taipei, Taiwan, the location of the nearest international airport with service to and from the United States.
6. The flight from Taipei to San Francisco, California, is over eleven hours long by commercial airline. To travel from Taipei to Minneapolis, Minnesota would take at least fifteen hours each way. There is no direct commercial flight, so at least one transfer would be required.
7. Although I occasionally travel to the United States for business, I have no trips to the United States currently planned. My last trip to the United States was in December, 2003. During this trip, I visited several customers, including 3M Company and Fellowes, Inc. to discuss business. Although I did discuss the pending litigation with the general counsel of Fellowes, Inc., that discussion was not the purpose of my trip or of my visit to Fellowes.
8. It would be a substantial hardship on Velo Enterprises if both Mr. Wu and I were required to be absent from the company for several days for depositions in Minnesota. As a compromise, I offered to travel to San Francisco, California to be deposed there so long as the plaintiffs would agree to depose Mr. Wu in Taiwan by video teleconference. However, this offer was rejected. Mr. Wu and I are still willing to travel from Taichung for a deposition in Taipei in order to help accommodate plaintiffs' counsel's travel.
9. English is not my first language, and I require a translator if the deposition is to be conducted in English. There are numerous Taiwanese-English translators available in Taiwan.

I declare under the penalty of perjury under the law of the United States of America that the foregoing is true and correct and this declaration is signed at Tachia, Taichung, Taiwan on May 25, 2004.


Stella Yu